R. Hance Haney
Executive Director – Federal Regulatory

1020 19th Street NW, Suite 700
Washington, DC 20036

202 429 3125
202 293 0561 fax
Email hhaney@qwest.com

ride the light
Qwest.

August 8, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: *Application of Qwest Communications International, Inc. To Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota*, WC Docket No. 02-148

Application of Qwest Communications International, Inc. To Provide In-Region InterLATA Services in the States of Montana, Utah, Washington & Wyoming, WC Docket No. 02-189

Dear Ms. Dortch:

At the request of the staff of the Wireline Competition Bureau, Qwest has provided the attached responses to questions relating to service order accuracy, due date changes and manual handling, disconnects, Qwest's flow through system and FOCs and SOCs.

The twenty-page limit does not apply as set forth in DA 02-1390 and DA 02-1666.

Sincerely,

Hance Haney

cc: M. Carowitz
E. Yockus
G. Remondino
M. Cohen
R. Harsch
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith
J. Myles

J. Stanley
S. Vick
J. Orchard
C. Washburn
S. Oxley

QUESTION:

What does Qwest do to limit the percentage of human errors on orders?

RESPONSE:

Qwest provided the following information in Tab 7 of an ex parte filed on 07/10/02. In this document, Qwest has expanded on the initial information provided as well as providing dates for the implementation of each of these items.

As an initial matter, the small number of human errors identified are within a reasonable tolerance level. The data from the Liberty Consulting Data Reconciliation make this plain. Nevertheless, Qwest has taken, and continues to take, quality assurance measures directed at reducing the number of human errors in order processing.

- Up-front IMA Edits: The first line of defense is the IMA edits. These edits prevent LSRs that contain errors from reaching Qwest. The more known errors that can be caught by the system, the less opportunity for manual error to occur. Qwest implements additional edits in every release of IMA, attempting to focus on those errors that are most prevalent on CLEC LSRs.

    - New IMA edits must be disclosed with a major release (e.g. 8.0, 9.0, 10.0, 11.0). On some occasions, the new edits are disclosed with a major release but are not actually implemented until a later release, such as IMA 10.01. These edits are prioritized through the Change Management Process for inclusion in the various releases. Therefore, the CLECs have the final decision on which edits are implemented.

- Improved Flow-Through: With each improvement in Qwest's flow-through results, the opportunity for human error diminishes. Qwest has made significant improvements in our flow-through rates, more than doubling our resale rate from March 2001 to March 2002 (as measured in PO-2A) and nearly doubling our flow-through rate for the other products for that same timeframe. CLECs have an opportunity to work with Qwest to improve such flow-through rates through prioritization in the Change Management Process.

    - Many flow-through improvements are also related to major IMA releases. Flow-through rates are positively impacted by improved up-front edits. In addition, non-CLEC-impacting system changes can be made to the Flow-Through System (FTS) to improve the processing done on the LSRs. These improvements are included in the published IMA/FTS releases.

- SDC Training Curriculum: A training curriculum exists for each Qwest Service Delivery Coordinator (SDC) based on the product set that he/she will support. Each SDC completes the appropriate training and also "nests" with an experienced SDC following the training. This "nesting" period provides support to an individual until they are able to

work independently. During the data reconciliation and OSS Test, both Liberty and KPMG evaluated much of this training material and found it sufficient.

  - The customized Qwest SDC curriculums have been in place for several years, as has the practice of "nesting". The training documentation is updated on a continuous basis to ensure that the latest information is available.

- Interconnect Service Center Individual Quality Reviews: Center managers review service orders created by each SDC on their team on a weekly basis. Individual feedback is provided immediately. This review allows areas of misunderstanding or confusion to be addressed quickly and to not be masked in data that has been summarized. Additional training is provided if it is determined to be the reason for the performance gaps.

  - Individual quality reviews have been used sporadically for years. During 2001, Qwest realigned its service centers into a "virtual center" structure. During second and third quarter 2001, individual reviews were implemented in all centers. As part of a commitment to continuous improvement, detailed checklists by product family were created during first quarter 2002 to drive additional consistency in the reviews.

- Interconnect Service Center Trend Analysis: This work is a counterpart to the individual quality reviews. If center managers identify that a common error is occurring across multiple individuals, a process exists for that information to be fed to the process support staff. At that point, the process staff will provide to all impacted centers a reminder of what process should be followed and, if appropriate, a job aid. These communications are delivered via an automated system to every coach in the impacted centers for review with their teams.

  - Also as part of a commitment to continuous improvement, a trend analysis process was documented during first quarter 2002. This formalized the identification of common problems that was already occurring.

- Internal Audits: In cases where a concern has been raised, the process staff may also choose to do an internal audit to evaluate the level of the issue. The application date audit information provided above is one such example. These audits can be one-time or ongoing depending on the circumstances. Again, the information is used to identify a need for job aids, process clarifications, reminders to the centers, or system enhancements.

  - Internal audits have been conducted on an as-needed basis for the last 4 years. For example, these audits have been conducted in response to concerns with Qwest's performance as measured by the Performance Indicator Definitions or concerns raised in the OSS test.

- Legacy System Enhancements: As described above, Qwest has and continues to implement improved edits in its IMA system to address common LSR errors. Qwest also

implements edits in its internal systems to reduce or eliminate common Qwest processing errors.

- The legacy system enhancements identifed here are prioritized by Qwest. Some changes are simple updates to rules that can be done in a matter of days. Others require weeks or months of development effort.

- New Service Order Accuracy PID: Finally, in response to KPMG's Manual Order Entry PID Adequacy study, Qwest developed a new performance measurement (PO-20) to report on order accuracy. Qwest agreed to provide and discuss additional data in the context of Long Term PID Administration forums. However, due to the time it often takes to negotiate a new PID, rather than wait for the final version, Qwest will begin reporting data under this PID in its June results reported in July 2002. The data collected under this PID will be an additional source of information for Qwest to drive ongoing process improvements.

- The new PO-20 PID was initially defined and reported in June 2002. Qwest has agreed to analyze April and May data using the same definition.

Qwest's Response to Error When It Does Occur: Despite the best efforts of the CLECs and Qwest, some LSRs will be received with errors and will be processed incorrectly. Similarly, in some circumstances, complete and accurate LSRs will be received and processed incorrectly. In these cases, Qwest again provides several avenues for the CLEC to obtain assistance.

- Online Status Tools Available through IMA: These tools provide a CLEC visibility to the order throughout the process. In IMA 10.1, scheduled for August 2002, this tool-set will be enhanced to include service order detail, which will be provided following the FOC.

- Online status information has been available since IMA was first implemented. Enhancements have been implemented throughout the life of the system.

- ISC Help Desk: CLECs can contact the Help Desk with any LSR-related issue. This is the optimal contact point for issues specific to one LSR.

- The ISC Help Desk has handled any LSR-related issue for several years.

- Service Management Team Assigned to the CLEC: CLECs can contact their service managers at any issue. If the CLEC believes they are seeing a pattern of problems with their LSRs, this is the best avenue for them to raise that issue.

- Each CLEC is assigned a service management team as soon as they begin doing business with Qwest.

- Change Management Process (CMP): Through CMP, CLECs can request system, product or process changes that would improve their interaction with Qwest.

- CMP has been in place for several years. Significant work has been done with the CLECs over the last year to enhance these processes.

In summary, Qwest's data shows that the percentage of human errors experienced by CLECs in manually processed orders is within the range of reasonableness to be expected. It is certainly substantially less than the 15% alleged by AT&T and Covad. This is evidenced by the Liberty Data Reconciliation, and internal audits of manually processed orders. Nonetheless, Qwest has implemented several tools to help both CLECs and Qwest minimize the number of opportunities for human error. Finally, Qwest has also implemented a series of tools that will allow CLECs to seek additional changes to the ordering and provisioning process.

Qwest drafted its new service order accuracy PID, PO-20, in May and reported it for the first time with the June 2002 results. During April and May 2002, Qwest had conducted internal audits focusing on the accuracy of the application date field on the service order. Using the service orders reviewed as part of these internal audits, Qwest performed the PO-20 comparisons and calculated what the results would have been for April and May 2002. In addition, Qwest is providing advance information on the July PO-20 results that will be reported in August. The following table details these results.

	Apr-02		**May-02**		**Jun-02**		**Jul-02**	
	# Orders Sampled	**PO-20 Accuracy**	**# Orders Sampled**	**PO-20 Accuracy**	**# Orders Sampled**	**PO-20 Accuracy**	**# Orders Sampled**	**PO-20 Accuracy**
Resale POTS	193	86.01%	163	84.66%	176	92.05%	252	88.10%
UNE-P POTS	138	94.93%	200	84.00%	265	89.06%	268	92.91%
Resale POTS/ UNE-P POTS	331	89.73%	363	84.30%	441	90.25%	520	90.58%
UBL	364	94.51%	363	95.87%	396	96.46%	417	95.20%

As described in the OSS Reply Declaration, filed July 29, 2002, Qwest has a system enhancement scheduled as part of IMA 10.1 on August 17, 2002. This enhancement addresses two of the most common errors that were seen across these four months of data. The system change implements edits at the point the FOC is being created by the SDC. First, the system retrieves all service orders that contain the PON for which the SDC is creating the FOC. The system will display the service order numbers and their associated due dates. The SDC can then select the correct order to associate with each line on the FOC. If the SDC does not see all the orders he/she has created for this LSR, the SDC will go back into the SOP and review and correct the order(s) that do not have the appropriate PON. This will allow the SDC to continue with the creation of the FOC. The system will require service orders that are included on the FOC to have the PON on the service order match the PON on the LSR. Second, the system will flag any differences between the due date on the service order and the due date on the FOC. Qwest is analyzing the four months of data to determine what impact this system enhancement would have had on the results presented above. Qwest anticipates being able to provide this further analysis on August 8, 2002.

QUESTION:

Provide a retail versus wholesale parity analysis for due date changes and manual handling.

RESPONSE:

Using May Colorado data an analysis was performed comparing CLEC and Retail due date changes.

684 CLEC orders that showed a due date change as being initiated by Qwest were analyzed. Of these, 44%, (or 299 orders), were completed on Plant Test Date (PTD), which is prior to the due date, with the CLEC's approval. This information was obtained by reviewing the actual log notes from the Work Force Administration (WFA) system. When an order is provisioned prior to its due date, the Service Order Processor (SOP) requires that the due date on the order be modified to match the actual completion date. However, the SOP does not allow codes that would identify the reason for the early completion to be placed on service orders that have already completed in WFA. Therefore, PO-15 cannot appropriately exclude these as being desired by the CLEC.

The same type of research was performed on a statistical sampling of retail orders that reflected a Qwest initiated due date change. Out of the 350 orders researched, 15% (or 52 orders) completed early and received the customer's approval to do so. As described above, Qwest was not able to exclude these orders from the PO-15 numerator.

This demonstrates that Qwest is able to improve service delivery dates for CLECs more often than for its own retail customers; in fact based on this sampling, Qwest was improving CLEC due dates almost 3 times as often as it was able to improve retail due dates. If Qwest's systems had allowed us to identify these changes as customer-approved, the May PO-15 CLEC results for CO would improve from .06 to .03 due date changes initiated by Qwest per order. The results for Qwest Retail would remain at .04 reflecting that Qwest was initiating due date delays on retail orders more frequently than on wholesale orders.

QUESTION:

Respond to Eschelon's comments regarding disconnect problems.

ANSWER:

Unlike conversions where the product remains unchanged, during a conversion of Centrex 21 to a POTS service, there is a 30-second period when a customer is out of service. This is true for Retail customers converting from Centrex 21 to POTS service, as well as conversions from Centrex 21 to UNE-P or Resale POTS. The Wholesale process utilizes Disconnect / New Connect related order processing to accommodate the product change at conversion. The overall provisioning steps in Network are the same for Retail and Wholesale. The entire Network process takes less than 3 minutes and requires switch translations for outward (Centrex 21) and inward (POTS) line activity, which result in approximately 30 seconds of out-of-service impact. These switch translations are automatic and do not typically involve human intervention. To further minimize the impacts to end users, these types of orders are worked between 11:00 p.m. and 6:00 a.m.

A situation does exist that causes a longer out-of-service period. This situation effects both Retail and Wholesale conversion orders, but the situation is rare – it applies to conversion orders that include hunt groups with the call forwarding feature where the lines are served by a Nortel DMS100 switch. In this rare situation, automated provisioning in the switch will be interrupted and manual handling of switch translations will be required. Qwest has been able to identify only two Eschelon orders that fell into this category between January and July, 2002. In both cases, the service for the 1st or Pilot number, which is usually the published number for the customer, was not taken out of service. The lines that followed the Pilot number in the hunt group were out of service, but were working as requested within 4 to 12 hours.

QUESTION:

Describe how the whole flow through system work. What's being measured and what's in the denominator.

ANSWER:

Qwest electronically flows CLEC requests from the specified electronic gateway interface to the Service Order Processor (SOP). This process is the same whether an LSR is submitted by EDI or via the IMA GUI. When a CLEC request is received, the business processing layer (BPL) of IMA performs edit validations on the request. If the LSR fails the BPL edits, it is either automatically rejected or sent to the Interconnect Service Center (ISC) for manual handling. If the LSR passes the BPL edits, it is either sent to the Flow Through System (FTS) for service order creation or to the Interconnect Service Center (ISC) for manual handling[1].

Once received, FTS determines whether the request is eligible to be sent downstream in the process. The non-eligible requests are routed to the ISC for manual handling[1]. FTS translates the LSR into internal service orders in the Service Order Processor (SOP). When all SOP edits are passed, these orders are distributed to downstream provisioning systems. If the SOP detects an error on the service order, FTS sends the LSR to the ISC for manual assistance. Once a service order has been successfully created in the SOP and has been distributed downstream for provisioning, a FOC is sent via the interface the CLEC used to submit the LSR. If the LSR was processed manually, the SDC causes the FOC to be sent. If the LSR was successfully flowed-through, the FOC is automatically sent by the system. An LSR is considered a flow-through order for PO-2 if it is electronically submitted and the service orders are created and distributed by FTS.

Qwest worked with the CLECs to develop specific product categories that would be included in the PID PO-2 measure. PO-2 is split into two categories: PO-2A, which measures the percentage of *all* electronic LSRs for the defined product categories that flow from the specified electronic gateway interface through the Service Order Processor (SOP) without any human intervention, and PO-2B, which measures the percentage of all *flow-through-eligible* LSRs that flow from the specified electronic gateway interface through the SOP without any human intervention.

PO-2A has four defined product categories: Resale, Unbundled Loop, Local Number Portability (LNP) and UNE-P POTS. Following is a table that depicts the products that are included and which product category they fall into:

Product Name	Product Category
Centrex 21	Resale
Centrex Plus/Centron/Centrex Prime	Resale
Analog PBX DID	Resale
PBX (USOC TFB, TFU, TCG)	Resale
Private Line (DS0, DS1, DS3)	Resale
ISDN PRI T1	Resale

[1] When receiving a manually handled request, the ISC performs additional validation of the request and either creates a service order(s) for the LSR or manually rejects the request back to the CLEC.

Product Name	Product Category
ISDN PRI Trunk	Resale
ISDN BRI	Resale
POTS	Resale
UNE-P (POTS)	UNE-P (POTS)
LSNP (Loop Svc with NP)	Unbundled Loop
UBL (Unbundled Loop)	Unbundled Loop
LNP (Local Number Portability)	Local Number Portability
Frame Relay	Resale
Megabit	Resale
DESIGNED TRUNKS (Includes designed PBX trunks)	Resale
UNE-STAR POTS	UNE-P (POTS)

All LSRs received, whether a supplement or original LSR, are included in the denominator for PO-2A, subject to the exclusions published in the PID.

PO-2B includes a subset of PO-2A, which are LSRs that are eligible for flow-through and are described in the following matrix:

Product Name	Product Category
POTS	Resale
UNE-P (POTS)	UNE-P (POTS)
LSNP (Loop Svc with NP)	Unbundled Loop
UBL (UBL as defined in the PID)	Unbundled Loop
LNP	Local Number Portability
UNE-STAR (POTS)	UNE-P (POTS)

Eligibility for whether a LSR should be included in the denominator is defined in the matrix at the end of this document and is also available on Qwest's web site at the following URL: http://www.qwest.com/wholesale/clecs/ordering.html. If an LSR for one of the product categories above is received and it falls within the parameters defined for eligibility in the matrix, it is included in the denominator for PO-2B. In other words, there is a 3-step process for determining if an LSR should be counted in the denominator for PO-2B.

The first step is selecting LSRs that are requesting one of the products defined for inclusion. The second step is to consider the activity being requested; the "Activity Types" column, in the matrix, defines eligible activities by product category. The final step is to review the content of the LSR to determine if any of the conditions listed in the "Exceptions to Flow Through" column are present on that LSR. If none of the conditions listed are present, the LSR is included in the PO-2B denominator. For example, while UNE-P POTS new installations are eligible for flow through, if a UNE-P POTS new install LSR has the Expedite field populated (one of the listed exceptions), that LSR would not be counted in the denominator.

Product Categories	Activity Types (LSR Form Activity (ACT) Field)	Exceptions to Flow Through (Exceptions apply to all versions of IMA except as noted)
Unbundled Local Loop	• Conversion as Specified (ACT V) • New Installation (ACT N) • Disconnect (ACT D) • Outside Move (ACT T)	• CLEC sets manual handling indicator • Supplemental Orders (Due Date Change and Other Change) • Expedites • LSR Quantity >20 ACT "V", "N", "T", and "D" • LSR Quantity > 10 ACT "T" and "D" (IMA versions 10.0 and Post 10.0 LSRs only) • Government Account (Type Of Service (TOS) 3) • Pending orders ACT "V", "N" and "T" (actual or indicated by CLEC) • Related Requests (Related Purchase Order Number (RPON) or Related Order (RORD)) • Partial conversion on accounts with multiline hunting • CLEC sets Address not in Database indicator (e.g., new construction)(Address Not Validated (ANV)) • ADSL Compatible Loop ACT "V", "N" and "T" • ISDN BRI Capable Loop ACT "V", "N" and "T" • xDSL-I Capable Loop ACT "V", "N" and "T" • DS1 Capable Loop ACT "V", "N" and "T" • Optical Carrier level n (OCn) Capable Loop ACT "V", "N" and "T" • DS3 Capable Loop ACT "V", "N" and "T"
Unbundled Local Loop with LNP	• Conversion as Specified (ACT V) • Conversion as Specified No Directory Listing (ACT Z)	• CLEC sets manual handling indicator • Supplemental Orders (Due Date Change and Other Change) • Expedites • LSR Quantity >20 • Government Account (TOS 3) • Pending orders (actual or CLEC specified)

		• Related Requests (RPON or RORD) • Partial conversion on accounts with multiline hunting • ADSL Compatible Loop • ISDN Basic Rate (BRI) Capable Loop • xDSL-I Capable Loop • Complex product (non-POTS) porting
LNP	• Conversion as Specified (ACT V) • Conversion as Specified No Directory Listing (ACT Z)	• CLEC sets manual handling indicator • Supplemental orders (Due Date Change and Other Change) • Expedites • LSR Quantity > 20 • Government Account (TOS 3) • Complex products (non-POTS) • Pending Orders (actual or CLEC indicated) • Related Requests (RPON or RORD) • Partial conversion on accounts with multiline hunting.
Resale – Local Exchange Services and UNE-P - POTS	• Conversion as is (ACT W) • Conversion as specified (ACT V) • Conversion as Specified No Directory Listing (ACT Z) • Change (ACT C) • New Installation (ACT N) • Disconnect (ACT D) • Outside Move (ACT T) • Restore (ACT B) • Suspend (ACT L) • Deny ACT (Y)	• CLEC sets manual handling indicator • Supplemental Orders (Due Date Change and Other Change) • Expedites • LSR Quantity >20 • Government Account (TOS 3) • Number Changes on multi-line accounts • Pending Orders ACT "W", "V", "Z", "C", "N", "D", "T", "L", and "Y" (actual or CLEC indicated) • Related Requests (RPON or RORD) • Partial conversion on accounts with multiline hunting • CLEC sets Address not in Database indicator (e.g., new construction)(ANV) • Conversions with voice mail rollover • Eastern Region: CLEC to CLEC conversions • Resale POTS to Resale POTS • UNE-P (POTS) to Resale (POTS) • Central and Western Regions: Conversions with TN changes • Telephone number fields populated with placeholders

		• Resale Qwest DSL • Resale Centrex (Plus, Prime, Centron, 21) • Resale Private Line • Resale ISDN BRI • Resale – PBX Trunk Service • Resale - Frame Relay Service (FRS) • Resale Remote Call Forwarding • Resale - PAL Service • UNE-P – Centrex (Plus, Prime, Centron, 21) • UNE-P - DSS • UNE-P - ISDN PRI • UNE-P - ISDN BRI • UNE-P - PBX Trunks • UNE-P - PAL

Specific products are eligible for system Flow Through when the LSR is canceled (supplemental type 1 request) via IMA. The products, activity types, and exceptions to Flow Through eligibility are as follows:

Products	**Activity Types (LSR Form ACT Field)**	**Exceptions to Flow Through (Exceptions apply to all versions of IMA except as noted)**
• Unbundled Local Loop • Unbundled Local Loop with LNP • LNP • Resale- Local Exchange Services – Business and Residence POTS • Resale ISDN BRI • Resale Centrex Plus and Centron, • Resale Centrex Prime • Resale Centrex 21 • Resale – DID Analog In Only Trunk • Resale Design Trunk • UNE-P - POTS	• ALL	• Version of PON prior to cancel is not in an "ISSUED" Status • ACT = N and the Account Number (AN) field is not populated. • For Unbundled Local Loop, Unbundled Local Loop with LNP, Resale Designed Trunks and Resale – DID Analog In Only Trunks: • Time prior to the service order due date for the original request is less than 24 hours • LNP, Resale – Local Exchange Services – Business and Residence

		POTS, Resale ISDN BRI, Resale Centrex Plus and Centron, Resale Centrex Prime, Resale Centrex 21 and UNE-P – POTS: • Time prior to the service order due date for the original request is less than 24 hours and the Line Activity (LNA) is not equal to 'N' and an appointment is indicated on the APTCON field • Time prior to the service order due date for the original request is less than 24 hours and the LNA or the Trunk Activity (DTNRACT or DTKACT) is equal to 'N' • Resale Private Line • Resale – PBX Trunk Service • Resale – FRS • Resale Qwest DSL • Resale ISDN PRI

QUESTION:

Explain when FOCs and SOCs are issued.

ANSWER:

There are two types of notifications provided in response to a CLEC's LSR: LSR-level notices and Service Order-level notices. Generally, the LSR notices are those defined by the OBF's LSR guidelines, and the service order notices are status updates that CLECs can choose to receive in addition to the LSR notices. The normal sequence and types of notices is described below.

Firm Order Confirmation (FOC) Notice – LSR level
An LSR (Local Service Request) is submitted to Qwest through IMA (Interconnect Mediated Access) via the IMA GUI or EDI. The LSR is reviewed and errors are resolved through electronic and/or verbal communication with the CLEC. Once Qwest has a complete and error-free LSR from the CLEC, one or more service orders[2] are issued in Qwest's Service Order Processor (SOP). When the service order(s) have been successfully issued in the SOP an FOC is issued and returned to the CLEC via IMA GUI (as well as via E-mail and/or Fax at the CLEC's direction) or EDI depending on how the LSR was initially received.

The FOC communicates the details associated with the CLEC's LSR such as the due date, the order number or numbers, and the line identifiers (telephone numbers or circuit IDs). This notice establishes for the CLEC the number of internal orders Qwest has issued in order to process the request. The timeliness of these notices is measured and report in PID PO-5.

Provisioning Completion Status Update– Service Order level[3]
When the provisioning work for an individual service order is completed in the Work Force Administration (WFA) system, a service order level provisioning complete status update can be received by the CLEC. This informs the CLEC that a portion of the actual provisioning work is physically done.

Service Order Complete Status Update – Service Order level
As the provisioning work is completed each service order is processed for SOP completion. Notification of each SOP service order completion is sent to CLECs who have chosen to receive them.[4]

[2] Qwest analyzed the service order to LSR ratio for May, June and July 1-21, 2002. For Resale POTS and UNE-P POTS, the ratio was consistently between 1.03:1 and 1.04:1. A more detailed attachment is provided.
[3] GUI and EDI users define in IMA what service order level status updates they wish to receive. For GUI users, these updates are available in a window on their desktop; these updates are transmitted to EDI users.
[4] In addition, the Loss and Completion Report identifies service orders that have completed in the SOP.

Service Order Completion (SOC) Notice – LSR level
Once the last service order associated with the LSR has completed in the SOP, the LSR is considered complete. An LSR level completion notice, commonly referred to as a SOC, is sent to the CLEC signaling all requested work has been completed. The timeliness of this notification is measured in PID PO-6.

Billing Completion (also known as **Bill Posted) Status Update – Service Order level**
After each service order completes in the SOP, it is processed in the CRIS [Billing System]. Once the service order has successfully posted to billing, a Billing Completion status update is sent to the CLEC. The timeliness of this status update is measured in PID PO-7. This PID measures timeliness for all GUI customers (based on when Qwest makes this update available) and for EDI customers who have signed up for the status update (based on when the update is transmitted from the Qwest EDI gateway).[5]

Because the SOC is an LSR level notice and the BCN is a service order level update, there are limited occasions when a BCN can precede the SOC. This occurs when there are multiple service orders associated with the LSR and the service orders do not complete at the same time. The completion of an individual service order can be delayed for several reasons, including:

- Customer not ready – the customer accepts a portion of the requested service
- Lack of facilities – a portion of the request goes into jeopardy for a lack of facilities and the CLEC chooses to proceed with partial service
- A service order is not completed in the SOP even though the provisioning work was completed
- The LSR completion was delayed due to a mismatch of service order numbers/PON.

In these instances, if all the service orders associated with the LSR have not completed, the SOC is not issued. However, the Billing Completion status update will still be received for each order that has completed when that order posted to billing.

MAY 2002			
	#LSRS	#SO's	RATIO (SO's to LSRs)
UBL	20839	36955	1.77:1
RESALE POTS	31462	32469	1.03:1

[5] PO-7B was modified, at the request of the CLECS, in January 2002 to measure at the point the update was actually transmitted via EDI. No EDI customers have requested this notice be sent. Therefore, there have been no PO-7B results since January.

UNE-P POTS	11269	11747	1.04:1
JUNE 2002			
	#LSRS	**#SO's**	**RATIO (SO's to LSRs)**
UBL	21014	40388	1.92:1
RESALE POTS	29216	30323	1.04:1
UNE-P POTS	9011	9376	1.04:1
JULY 2002 (1ST - 21ST)			
	#LSRS	**#SO's**	**RATIO (SO's to LSRs)**
UBL	13867	27825	2.01:1
RESALE POTS	20316	21000	1.03:1
UNE-P POTS	6433	6718	1.04:1